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ALEXANDRA MARWA SABER p/k/a  
7 DENIMS

8 UNITED STATES DISTRICT COURT  
9 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

10  
11 TED ENTERTAINMENT, INC., a  
California Corporation,

12 Plaintiff,

13 vs.

14 ALEXANDRA MARWA SABER f/k/a  
15 MARWA TALATT ABDELMONEM  
p/k/a DENIMS, an individual, and  
16 DOES 1-10,

17 Defendants.

Case No. 2:25-cv-05564-WLH-PD

*Hon. Wesley L. Hsu*

**DEFENDANT ALEXANDRA  
MARWA SABER'S ANSWER TO  
COMPLAINT**

**DEMAND FOR JURY TRIAL**

Action filed: June 19, 2025

1 Defendant ALEXANDRA MARWA SABER p/k/a DENIMS (“Defendant”)  
2 hereby answers the Complaint of Plaintiff TED ENTERTAINMENT, INC., a  
3 California Corporation (“Plaintiff”) as follows.

4 **ANSWER TO COMPLAINT**

5 1. Paragraph 1 contains legal conclusions to which no response is required.  
6 Notwithstanding the foregoing, Defendant lacks sufficient knowledge or information  
7 to form a belief concerning the truth of the factual allegations contained therein and  
8 on that basis denies such allegations.

9 2. Defendant denies the allegations in Paragraph 2 of the complaint.

10 3. Answering Paragraph 3, Defendant lacks sufficient knowledge or  
11 information to form a belief concerning the truth of the factual allegations contained  
12 therein and on that basis denies such allegations.

13 4. Defendant denies the allegations in Paragraph 4 of the complaint.

14 5. Defendant denies the allegations in Paragraph 5 of the complaint.

15 6. Paragraph 6 contains legal conclusions to which no response is required.

16 7. Paragraph 7 contains legal conclusions to which no response is required.

17 8. Paragraph 8 contains legal conclusions to which no response is required.

18 9. Answering Paragraph 9, Defendant lacks sufficient knowledge or  
19 information to form a belief concerning the truth of the factual allegations contained  
20 therein and on that basis denies such allegations.

21 10. Defendant admits the allegation in Paragraph 10 of the complaint.

22 11. Answering Paragraph 11, Defendant lacks sufficient knowledge or  
23 information to form a belief concerning the truth of the factual allegations contained  
24 therein and on that basis denies such allegations.

25 12. Answering Paragraph 12, Defendant lacks sufficient knowledge or  
26 information to form a belief concerning the truth of the factual allegations contained  
27 therein and on that basis denies such allegations.

28 13. Paragraph 13 contains legal conclusions to which no response is

1 required. Notwithstanding the foregoing, Defendant lacks sufficient knowledge or  
2 information to form a belief concerning the truth of the factual allegations contained  
3 therein and on that basis denies such allegations.

4 14. Paragraph 14 contains legal conclusions to which no response is  
5 required. Notwithstanding the foregoing, Defendant lacks sufficient knowledge or  
6 information to form a belief concerning the truth of the factual allegations contained  
7 therein and on that basis denies such allegations.

8 15. Answering Paragraph 15, Defendant lacks sufficient knowledge or  
9 information to form a belief concerning the truth of the factual allegations contained  
10 therein and on that basis denies such allegations.

11 16. Defendant denies the allegations in Paragraph 16 of the complaint.

12 17. Defendant denies the allegations in Paragraph 17 of the complaint.

13 18. To the extent the allegations set forth in Paragraph 18 purport to  
14 summarize or characterize the contents of the referenced document, the document  
15 speaks for itself. Notwithstanding the foregoing, Defendant denies the allegations in  
16 Paragraph 18 of the complaint.

17 19. To the extent the allegations set forth in Paragraph 19 purport to  
18 summarize or characterize the contents of the referenced document, the document  
19 speaks for itself. Notwithstanding the foregoing, Defendant denies the allegations in  
20 Paragraph 19 of the complaint.

21 20. To the extent the allegations set forth in Paragraph 20 purport to  
22 summarize or characterize the contents of several documents, the documents speak  
23 for themselves. Notwithstanding the foregoing, Defendant denies the allegations in  
24 Paragraph 20 of the complaint.

25 21. Answering Paragraph 21, Defendant lacks sufficient knowledge or  
26 information to form a belief concerning the truth of the factual allegations contained  
27 therein and on that basis denies such allegations.

28 22. Answering Paragraph 22, Defendant lacks sufficient knowledge or

1 information to form a belief concerning the truth of the factual allegations contained  
2 therein and on that basis denies such allegations.

3 23. Answering Paragraph 23, Defendant lacks sufficient knowledge or  
4 information to form a belief concerning the truth of the factual allegations contained  
5 therein and on that basis denies such allegations.

6 24. Answering Paragraph 24, Defendant lacks sufficient knowledge or  
7 information to form a belief concerning the truth of the factual allegations contained  
8 therein and on that basis denies such allegations.

9 25. Answering Paragraph 25, Defendant lacks sufficient knowledge or  
10 information to form a belief concerning the truth of the factual allegations contained  
11 therein and on that basis denies such allegations.

12 26. Answering Paragraph 26, Defendant lacks sufficient knowledge or  
13 information to form a belief concerning the truth of the factual allegations contained  
14 therein and on that basis denies such allegations.

15 27. Answering Paragraph 27, Defendant lacks sufficient knowledge or  
16 information to form a belief concerning the truth of the factual allegations contained  
17 therein and on that basis denies such allegations.

18 28. Answering Paragraph 28, Defendant lacks sufficient knowledge or  
19 information to form a belief concerning the truth of the factual allegations contained  
20 therein and on that basis denies such allegations.

21 29. Answering Paragraph 29, Defendant lacks sufficient knowledge or  
22 information to form a belief concerning the truth of the factual allegations contained  
23 therein and on that basis denies such allegations.

24 30. Answering Paragraph 30, Defendant lacks sufficient knowledge or  
25 information to form a belief concerning the truth of the factual allegations contained  
26 therein and on that basis denies such allegations.

27 31. Answering Paragraph 31, Defendant lacks sufficient knowledge or  
28 information to form a belief concerning the truth of the factual allegations contained

1 therein and on that basis denies such allegations.

2 32. Answering Paragraph 32, Defendant lacks sufficient knowledge or  
3 information to form a belief concerning the truth of the factual allegations contained  
4 therein and on that basis denies such allegations.

5 33. Answering Paragraph 33, Defendant lacks sufficient knowledge or  
6 information to form a belief concerning the truth of the factual allegations contained  
7 therein and on that basis denies such allegations.

8 34. Answering Paragraph 34, Defendant lacks sufficient knowledge or  
9 information to form a belief concerning the truth of the factual allegations contained  
10 therein and on that basis denies such allegations.

11 35. Answering Paragraph 35, Defendant lacks sufficient knowledge or  
12 information to form a belief concerning the truth of the factual allegations contained  
13 therein and on that basis denies such allegations.

14 36. Answering Paragraph 36, Defendant lacks sufficient knowledge or  
15 information to form a belief concerning the truth of the factual allegations contained  
16 therein and on that basis denies such allegations.

17 37. Answering Paragraph 37, Defendant lacks sufficient knowledge or  
18 information to form a belief concerning the truth of the factual allegations contained  
19 therein and on that basis denies such allegations.

20 38. Answering Paragraph 38, Defendant lacks sufficient knowledge or  
21 information to form a belief concerning the truth of the factual allegations contained  
22 therein and on that basis denies such allegations.

23 39. Answering Paragraph 39, Defendant lacks sufficient knowledge or  
24 information to form a belief concerning the truth of the factual allegations contained  
25 therein and on that basis denies such allegations.

26 40. To the extent the allegations set forth in Paragraph 40 purport to  
27 summarize or characterize the contents of *The Nuke*, the document speaks for itself.  
28 Notwithstanding the foregoing, Defendant denies the allegations in Paragraph 40 of

1 the complaint.

2 41. Answering Paragraph 41, Defendant lacks sufficient knowledge or  
3 information to form a belief concerning the truth of the factual allegations contained  
4 therein and on that basis denies such allegations.

5 42. Answering Paragraph 42, Defendant lacks sufficient knowledge or  
6 information to form a belief concerning the truth of the factual allegations contained  
7 therein and on that basis denies such allegations.

8 43. Answering Paragraph 43, Defendant lacks sufficient knowledge or  
9 information to form a belief concerning the truth of the factual allegations contained  
10 therein and on that basis denies such allegations.

11 44. Answering Paragraph 44, Defendant lacks sufficient knowledge or  
12 information to form a belief concerning the truth of the factual allegations contained  
13 therein and on that basis denies such allegations.

14 45. Defendant denies the allegations in Paragraph 45 of the complaint.  
15 Further, Defendant lacks sufficient knowledge or information to form a belief  
16 concerning the truth of the factual allegations contained therein against H3Snark  
17 Mods.

18 46. Paragraph 46 contains legal conclusions to which no response is  
19 required.

20 47. Paragraph 47 contains legal conclusions to which no response is  
21 required.

22 48. Paragraph 48 contains legal conclusions to which no response is  
23 required.

24 49. Paragraph 49 contains legal conclusions to which no response is  
25 required.

26 50. Paragraph 50 contains legal conclusions to which no response is  
27 required.

28 51. Paragraph 51 contains legal conclusions to which no response is

1 required.

2 52. Paragraph 52 contains legal conclusions to which no response is  
3 required.

4 53. Paragraph 53 contains legal conclusions to which no response is  
5 required.

6 54. Paragraph 54 contains legal conclusions to which no response is  
7 required.

8 55. Paragraph 55 contains legal conclusions to which no response is  
9 required.

10 56. Paragraph 56 contains legal conclusions to which no response is  
11 required.

12 57. Paragraph 57 contains legal conclusions to which no response is  
13 required.

14 58. Paragraph 58 contains legal conclusions to which no response is  
15 required.

16 59. Paragraph 59 contains legal conclusions to which no response is  
17 required.

18 60. Paragraph 60 contains legal conclusions to which no response is  
19 required.

20 61. Paragraph 61 contains legal conclusions to which no response is  
21 required.

22 62. Paragraph 62 contains legal conclusions to which no response is  
23 required.

24 63. Paragraph 63 contains legal conclusions to which no response is  
25 required.

26 64. To the extent the allegations set forth in Paragraph 64 purport to  
27 summarize or characterize the contents of the referenced document, the document  
28 speaks for itself. Notwithstanding the foregoing, Defendant denies the allegations in

1 Paragraph 64 of the complaint.

2 65. Defendant denies the allegations in Paragraph 65 of the complaint.

3 66. Defendant denies the allegations in Paragraph 66 of the complaint.

4 67. Defendant denies the allegations in Paragraph 67 of the complaint.

5 68. Defendant denies the allegations in Paragraph 68 of the complaint.

6 69. Defendant denies the allegations in Paragraph 69 of the complaint.

7 70. To the extent the allegations set forth in Paragraph 70 purport to  
8 summarize or characterize the contents of the referenced document, the document  
9 speaks for itself. Notwithstanding the foregoing, Defendant denies the allegations in  
10 Paragraph 70 of the complaint.

11 71. Defendant denies the allegations in Paragraph 71 of the complaint.

12 72. Defendant denies the allegations in Paragraph 72 of the complaint.

13 73. Defendant denies the allegations in Paragraph 73 of the complaint.

14 **FIRST CLAIM FOR RELIEF**

15 **(For Direct Copyright Infringement – Against Denims)**

16 74. Defendant re-alleges and incorporates by reference each and every  
17 answer contained in Paragraphs 1-73 as though fully set forth herein.

18 75. Answering Paragraph 75, Defendant lacks sufficient knowledge or  
19 information to form a belief concerning the truth of the factual allegations contained  
20 therein and on that basis denies such allegations.

21 76. Answering Paragraph 76, Defendant lacks sufficient knowledge or  
22 information to form a belief concerning the truth of the factual allegations contained  
23 therein and on that basis denies such allegations.

24 77. Defendant admits the allegations in Paragraph 77 of the complaint.

25 78. Defendant denies the allegations in Paragraph 78 of the complaint.

26 79. Defendant denies the allegations in Paragraph 79 of the complaint.

27 80. Defendant denies the allegations in Paragraph 80 of the complaint.

28 81. Defendant denies the allegations in Paragraph 81 of the complaint.



**SECOND CLAIM FOR RELIEF**

**(Contributory Copyright Infringement – Against The H3Snark Mods)**

82. Defendant re-alleges and incorporates by reference each and every answer contained in Paragraphs 1-81 as though fully set forth herein.

83. Answering Paragraph 83, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein and on that basis denies such allegations.

84. Answering Paragraph 84, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein and on that basis denies such allegations.

85. Answering Paragraph 85, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein and on that basis denies such allegations.

86. Answering Paragraph 86, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein and on that basis denies such allegations.

87. Answering Paragraph 87, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein and on that basis denies such allegations.

**AFFIRMATIVE DEFENSES**

Without admitting the truth of any allegation set forth in the Complaint, Defendant asserts the following affirmative defenses to the Complaint and each and every cause of action purportedly stated therein.

**FIRST AFFIRMATIVE DEFENSE**

**(Failure to State a Claim)**

1. The Complaint, and each and every cause of action set forth therein, fails to state facts sufficient to constitute a cause of action upon which relief can be granted against Defendant.

1 **SECOND AFFIRMATIVE DEFENSE**

2 **(Fair Use Doctrine)**

3 2. The Complaint and each and every cause of action set forth therein, is  
4 barred, in whole or in part, or damages otherwise limited, based on the doctrine of fair  
5 use under 17 U.S.C. § 107.

6 **THIRD AFFIRMATIVE DEFENSE**

7 **(Express License)**

8 3. The Complaint, and each and every cause of action set forth therein, is  
9 barred, in whole or in part, to the extent Plaintiff granted an express license to any  
10 alleged direct infringer's use of Plaintiff's copyrighted work.

11 **FOURTH AFFIRMATIVE DEFENSE**

12 **(Implied License)**

13 4. The Complaint, and each and every cause of action set forth therein, is  
14 barred, in whole or in part, to the extent Plaintiff granted an implied license to any  
15 alleged direct infringer's use of Plaintiff's copyrighted work.

16 **FIFTH AFFIRMATIVE DEFENSE**

17 **(Unclean Hands)**

18 5. Plaintiff's claims are barred, in whole or in part, by the equitable doctrine  
19 of unclean hands.

20 **SIXTH AFFIRMATIVE DEFENSE**

21 **(Waiver)**

22 6. The Complaint, and each and every cause of action set forth therein, is  
23 barred in whole or in part by the doctrine of waiver.

24 **SEVENTH AFFIRMATIVE DEFENSE**

25 **(Estoppel)**

26 7. The Complaint, and each and every cause of action set forth therein, is  
27 barred in whole or in part by the doctrine of estoppel.  
28

**EIGHTH AFFIRMATIVE DEFENSE**

**(Justification/Excuse)**

8. Any of Defendant's actions taken with respect to Plaintiff were justified and/or excused, thereby barring Plaintiff's claims.

**NINTH AFFIRMATIVE DEFENSE**

**(Consent)**

9. The Complaint, and each and every cause of action set forth therein, is barred in whole or in part to the extent Plaintiff expressly or impliedly consented to the alleged acts and omissions by Defendant as described in the Complaint.

**TENTH AFFIRMATIVE DEFENSE**

**(Innocent Infringement)**

10. The Complaint, and each cause of action therein, is barred in whole or in part, or damages otherwise limited as to Defendant to the extent any infringing activity by Defendant was innocent.

**ELEVENTH AFFIRMATIVE DEFENSE**

**(No Injury or Damages)**

11. The Complaint, and each cause of action therein, is barred in whole or in part, or damages otherwise limited as to Defendant to the extent Plaintiff suffered no injury or damages.

**TWELFTH AFFIRMATIVE DEFENSE**

**(Good Faith)**

12. The Complaint, and each cause of action therein, is barred in whole or in part, or damages otherwise limited at to Defendant to the extent Defendant acted in good faith and without any intention of injuring Plaintiff.

**THIRTEENTH AFFIRMATIVE DEFENSE**

**(Inequitable Conduct)**

13. The Complaint, and each cause of action therein, is barred in whole or in part, or damages otherwise limited as to Defendant as a result of Plaintiff's inequitable

1 conduct.

2 **FOURTEENTH AFFIRMATIVE DEFENSE**

3 **(Unjust Enrichment)**

4 14. Plaintiff would be unjustly enriched if allowed to recover to the extent  
5 as alleged in the Complaint.

6 **FIFTEENTH AFFIRMATIVE DEFENSE**

7 **(Laches)**

8 15. The Complaint, and each and every cause of action set forth therein, is  
9 barred in whole or in part by the equitable doctrine of laches.

10 **SIXTEENTH AFFIRMATIVE DEFENSE**

11 **(Failure to Register Copyright)**

12 16. The Complaint, and each and every cause of action set forth therein, is  
13 barred in whole or in part to the extent Plaintiff failed to properly or timely register  
14 copyrights of the alleged works.

15 **SEVENTEENTH AFFIRMATIVE DEFENSE**

16 **(Lack of Notice)**

17 17. The Complaint, and each purported claim for relief therein, is barred in  
18 whole or in part to the extent that Plaintiff failed to provide Defendant adequate notice  
19 that Defendant's acts infringed on Plaintiff's copyrights.

20 **EIGHTEENTH AFFIRMATIVE DEFENSE**

21 **(Reservation of Additional Defenses)**

22 18. Defendant reserves the right to assert additional defenses as discovery  
23 and investigation of the facts continue.

24 WHEREFORE, Defendant prays for judgment against Plaintiff as follows:

- 25 1. That the Complaint be dismissed, with prejudice and in its entirety;  
26 2. That Plaintiff take nothing by reason of the Complaint;  
27 3. That Defendant be awarded her costs and attorneys' fees incurred in  
28

1 defending this action; and

2 4. That Defendant be granted such other and further relief as the Court may  
3 deem just and proper.

4  
5 DATED: August 14, 2025

FROST LLP

6  
7  
8 By:



BENJAMIN KASSIS

BENJAMIN GRUSH

Attorneys for Defendant

ALEXANDRA MARWA SABER p/k/a

DENIMS

**DEMAND FOR JURY TRIAL**

Defendant hereby demands a trial by jury on all issues and causes of action triable by a jury.

DATED: August 14, 2025

FROST LLP

By:



BENJAMIN KASSIS

BENJAMIN GRUSH

Attorneys for Defendant

ALEXANDRA MARWA SABER p/k/a  
DENIMS